June 14th, 2022

U.S. Department of Transportation,
Docket Operations, West Building Ground Floor, Room W12-140,
1200 New Jersey Avenue, SE.,
Washington, DC 20590

RE: Revision of Petition for Exemption – Docket #FAA-2020-1143-0001

Dear Sir or Madame:

The purpose of this document is to petition the U.S. Department of Transportation for an "exemption" to a Federal Aviation Regulation that has significant impact to our ability to construct and maintain our Nation's vital electrical infrastructure. Per 14CFR11.81, the following information is provided.

a) Your name and mailing address and, if you wish, other contact information such as a fax number, telephone number, or e-mail address;

PJ Helicopters
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Office – (530) 527-5059
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b) The specific section or sections of 14 CFR from which you seek an exemption;

14CFR 133.43 (a) and (b) – In regard to equipment used for class B HEC (human external cargo) operations applicable to PCDS system required by STC (SR02693LA).

14CFR 91.9(a) – Only applicable to Onboard Systems Dual Cargo Hook System, STC# SR02693LA flight manual supplement.

c) The extent of relief you seek and the reason you seek the relief;

PJ Helicopters seeks the maximum relief allowable by law.
The On-Board Dual Cargo Hook System®, STC # SR02693LA, has been installed on our fleet of (2) MD369 series, (2) Bell 206L3, (2) Bell 429, (15) Bell 407 helicopters. However, Part 27 certification rules dictate that the STC must have an approved Personal Carrying Device Systems (PCDS), consisting of long lines and harnesses.

Although Onboard System's STC does have an available PCDS; longlines, and specifications TSO C167 for harnesses, they do not meet the current electrical industry standards. Part 27.865 standards for ropes and harnesses were not intended for the power line industry. Therefore, using them can create additional safety concerns when used while working on the electrical grid (e.g., electrical conduction, heat, flashpoints, and abrasion). PJ Helicopters would like to use the following longlines, and harnesses for abrasion resistance and for electrical considerations:

- Steel 3/8" anti-rotational cable (meets ASME B30.12) 4 year or 2000 hour service life from date of manufacture.
- LCP with woven Technora® cover (meets ASME B30.12) 4 year or 2000 hour service life from date of manufacture.
- Vectran® (LCP) with Cordura® cover (meets ASME B30.12) 4 year or 2000 service life from date of manufacture.
- All Suspension Harnesses meeting ANSI 359.11 and OSHA 1926.

PJ Helicopters would like an exemption for 91.9(a) for the specific items of Onboard Systems Rotorcraft Flight Manual Supplement (RCFMS) (STC SRO269LA) and will comply with alternate means.

- Page 7 Section 2 Limitations, Paragraph 3 (PCDS Harness TSO-C167)
- Page 7 Section 2 Limitations, Paragraph 4 (PCDS Long Lines)

d) How your request would benefit the public as a whole;

PJ Helicopters provides helicopter support services to numerous construction companies and electric utilities across the United States in support of the country's electrical transmission grid. Many of these projects, or sections of them, are time critical, have limited access due to terrain or environmental concerns or otherwise impractical to access via typical ground based vehicles. Therefore, these electric utilities and construction contractors, rely heavily on PJ Helicopters and the helicopter industry to provide Part 133 external load support, including Class B HEC. Restrictions on HEC operations can greatly impact construction times and budgets of taxpayer funded projects, system outage times for maintenance and negatively impact the environment where grading, blasting, vegetation removal and construction of roads for ground based equipment is not desired.

e) Reason why the exemption would not adversely affect safety, or how the exemption would provide a level of safety at least equal to the existing rule;

PJ Helicopters will comply with these limitations of the (RCFMS) (STC SRO269LA) by the following alternate means and equivalent level of safety.

Page 7, Section 2 Limitations, Paragraph 3 (PCDS harness TSO-C167) – By using harnesses that meet or exceed Part 27.865 design loads for working, ultimate and limit loads for their rated weights and also meeting ANSI Z359.11, CZA 2259.10, and OHSA 1926 standards.

Page 7, Section 2 Limitations, Paragraph 4 (PCDS Long Lines) – Long lines, ropes and all other attaching means will meet or exceed HEC requirements of the Onboard Systems STC. This will include a design load of 800 lbs., limit load (3.5 times design load) of 2,800lbs and ultimate load (1.5 of limit load) 4,200 lbs. Individual longlines and lanyards will meet or exceed the same limit and ultimate load ratings for their working loads and also meeting ASME B30.12.

PJ Helicopters will follow all manufacturer's limitations and inspection criteria for components of the PCDS.

PJ Helicopters will continue to train all pilots and crewmembers prior to performing HEC operations, as outlined in Appendix A, Section 1, Rev. 17 or later version of the PJ Helicopters RLCFM, meeting the guidance shown in AC133-1B.

f) A summary we can publish in the Federal Register stating – (1) The rule from which you seek the exemption; (2) A brief description of the nature of the exemption you seek;

PJ Helicopters submits that a summary need not be published in the FEDERAL REGISTER.

Delaying action on this exemption will adversely affect us and our customers whom all support the national grid infrastructure. PJ Helicopters and our utility clients throughout the US, rely on Class B HEC as an essential safe work method in which to conduct transmission line construction and maintenance.

If the FAA decides that a summary in the FEDERAL REGISTER is necessary, please use the following statement:

PJ Helicopters seeks exemption from Part 91.9(a) of 14 CFR to perform Class "B" HEC operations using a Personal Carrying Device System comprised of equipment that meets or exceeds current industry standards.

g) Any additional information, views, or arguments available to support your request:

In the Onboard Systems RCFMS No. 121-69-00 page 7, paragraph 3 states, *"HEC operations require the use of a personnel Carrying Device System (PCDS) harness, which must be approved by the local Aviation Authority TSO-C167 provides one such acceptable means of approval". Paragraph 4 states, "HEC operations require the use of a Personnel Carrying Device Systems (PCDS) Long Line, which must be approved by the local Aviation Authority".*

Currently no FAA guidance has been written for the local FSDO level.

Included as Appendix A of this document are the following supporting documents.

1. Onboard System's RFMS for STC #SR02693LA, Revision 2 dated June 25, 2020
2. Current Appendix A, Section 1 of Winco's RLCFM Rev. 17, dated October 8th, 2020.
3. Lift-It Longline Information
4. Long Line Safety Bulletin
5. Lift-It Longline Covers
6. Lift-It A-frame Lanyard
7. All harnesses meeting ANSI 359.11, and OSHA 1926.
8. Vectran information
9. Technora information

If you want to exercise the privileges of your exemption outside the United States, the reason why you need to do so.

PJ Helicopters does not wish to exercise the privileges of this exemption outside the United States.

Respectfully Submitted,

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